

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

J.K.J.,

Plaintiff,

Civil Action No. 15-cv-428-wmc

v.

POLK COUNTY AND
DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

STIPULATION FOR PROTECTIVE ORDER

Defendant Polk County served Requests for Production of Documents upon Plaintiff J.K.J. dated December 2, 2015 which requested, amongst other things, “all journals, diaries, logs, or notes which you have prepared which discuss the incidents alleged in your complaint.”

Plaintiff J.K.J. Responded stating that “... Plaintiff has kept several journals that may discuss the incidents described in the Complaint, as well as other personal information.”

After review of the journals, Plaintiff produced those entries which they deemed responsive to the request and indicated that Defendant Polk County could review the remainder of the journals at Counsel’s office but further release of such journals would not occur without a Protective Order due to the highly personal nature.

In a good faith attempt to resolve this discovery dispute, Plaintiff, J.K.J., and Defendant Polk County agree to the entry of the accompanying Protective Order attached hereto without further notice. In accordance with Fed. R. Civ. P. 26(c)(1), the parties move the Court to adopt and enter the same.

Respectfully submitted this 12 day of January, 2017.

/s/ Lida M. Bannink

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